

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
Elaine Jones	:	
	:	Chapter 13
	:	
Debtor	:	Case No.: 15-15969

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Elaine Jones, by and through her undersigned counsel, hereby moves to modify her Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about August 20, 2015.
2. The Chapter 13 filing was assigned case number 15-15969.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about April 19, 2016.
4. On or about February 2, 2017, the Debtor and the mortgagee, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the December 14, 2018 Stipulation between the Movant and US Bank Trust, the Debtor is delinquent in the sum of \$14,236.96 in post-petition mortgage payments. A true and correct copy of the December 14, 2018 Stipulation is attached hereto as **Exhibit "A."**
6. In accordance with the December 14, 2018 Stipulation, specifically, paragraph number 3(b) the Debtor will cure the subject \$14,236.96 by amending the Chapter 13 within 30 days of the entry of the Order.

7. In furtherance of the Stipulation and the Debtor curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtor's proposed modified Chapter 13 Plan, attached hereto as **Exhibit "B"**, increases the Debtor's Plan payment by approximately \$875.00 per month (including attorney and trustee fees) and is deemed affordable by the Debtor.

9. This modification to the Chapter 13 Plan is feasible in accordance with the amended schedule J filed in conjunction with the instant Motion and will allow the Debtor to keep his real property.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: December 27, 2018

/s/Brad J. Sadek, Esq.
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